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ABSTRACT

This study compared the cost and effectiveness of residential schools for students with hearing and visual impairments to the education of these students in Mississippi's local public school districts. To compare the service providers, the study first calculated annual costs per student at the residential schools and per student with hearing and visual impairments in the local school districts statewide. The study then examined benefits provided by residential education and compared them to those provided by the districts. Findings indicate that at a FY 1999 cost of $42,500 per student, it cost $34,700 per year more to educate a student at the residential schools. Factors contributing to the high costs of operating the residential schools include unique cost components not present in local school districts (e.g., operating and staffing dormitories); allocation of other costs among fewer students; and expansion of a pre-vocational program with costly capital facility and specialized staffing needs. Despite the disparity of per-student cost between the residential schools and local school districts, the study found no conclusive evidence of greater benefits from a residential education. In comparing the two, the study found no appreciable difference in teacher qualifications, educational requirements, educational outcomes, or extracurricular activity requirements. (CR)

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Joint Legislative Committee on Performance Evaluation and Expenditure Review (PEER)

Report to
the Mississippi Legislature

Mississippi's Education of the Visually and Hearing Impaired: A Comparison of the Costs and Effectiveness of the State's Residential Schools and the Local School Districts

Because federal law requires all public school districts to provide a free and appropriate public education to hearing and visually impaired students which may, but is not required to, take place in a residential setting, and because the state's residential schools, the Mississippi Schools for the Deaf and Blind, have continued to educate students with these disabilities, the state faces a scenario of funding and operating dual service providers for hearing and visually impaired students.

PEER compared the cost and effectiveness of the Schools for the Deaf and Blind to the education of hearing and visually impaired students in the state's local public school districts. At a FY 1999 cost of $42,500 per student, it cost $34,700 per year more to educate a blind and/or deaf student at the state's residential schools than in the local public school districts.

Despite the disparity of per-student cost between the residential schools and the local school districts, PEER found no conclusive evidence of greater benefits from a residential education. In comparing the two, PEER found no appreciable difference in teacher qualifications, educational requirements, educational outcomes, or extracurricular activity requirements.

EC 308750

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November 15, 2000

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Honorable Ronnie Musgrove, Governor
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On November 15, 2000, the PEER Committee authorized release of the report entitled **Mississippi's Education of the Visually and Hearing Impaired: A Comparison of the Costs and Effectiveness of the State's Residential Schools and the Local School Districts.**

William Canon

Senator William Canon, Chairman

This report does not recommend increased funding or additional staff.

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Mississippi's Education of the Visually- and Hearing-Impaired: A Comparison of the Costs and Effectiveness of the State's Residential Schools and the Local School Districts

Executive Summary

Because federal law requires all public school districts to provide a free and appropriate public education to hearing- and visually-impaired students which may, but is not required to, take place in a residential setting, and because the Mississippi Schools for the Deaf and Blind have continued to educate students with these disabilities, the state faces a scenario of funding and operating dual service providers for hearing- and visually-impaired students.

PEER sought to compare the cost and effectiveness of the Schools for the Deaf and Blind to the education of hearing- and visually-impaired in the state's local public school districts. To compare the service providers, PEER first calculated annual costs per student at the Schools for the Deaf and Blind and per hearing- or visually-impaired student in the local school districts statewide. PEER then sought to identify benefits provided by a residential education and compare them to those provided by the districts.

It cost $34,700 per year more to educate a blind and/or deaf student at the state's residential schools than in the local public school districts.

At a FY 1999 cost of $42,500 per student, it cost $34,700 per year more to educate a blind and/or deaf student at the state's residential schools than in the local public school districts. Factors contributing to the high relative costs of operating the state's residential schools for the hearing- and visually-impaired include unique cost components not present in local school districts (e.g., operating and staffing dormitories); allocation of other costs among fewer students; and, expansion of a pre-vocational program with costly capital facility and specialized staffing needs.

PEER found no conclusive evidence of greater benefits from a residential education.

Despite the disparity of per-student cost between the residential schools and the local school districts, PEER found no conclusive evidence of greater benefits from a residential education. In comparing the two, PEER found no appreciable difference in teacher qualifications,

educational requirements, educational outcomes, or extracurricular activity requirements.

Recommendation

Due to the relatively high cost of a residential education for hearing- and visually-impaired students, the State Department of Education should further refine cost and effectiveness comparisons to develop policy options addressing the future of the Schools for the Deaf and Blind. This proposal could include policy options such as continuing to fund the schools as presently constituted, or closing the schools and implementing one or some combination of the following:

- offering pro rata grants to districts for the education of hearing- and visually-impaired students;
- developing specialized education centers for visually-impaired and hearing-impaired students in selected school districts;
- executing agreements with residential schools in surrounding states to educate students who cannot be served by the local districts.

As soon as is practicable, but no later than the 2002 legislative session, the department should present this proposal to the House and Senate Education committees and other appropriate legislative committees for their use in budget discussions and policy debate.

For More Information or Clarification, Contact:

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Mississippi's Education of the Visually and Hearing Impaired: A Comparison of the Costs and Effectiveness of the State's Residential Schools and the Local School Districts

Introduction

Authority

The PEER Committee authorized a review of the cost-effectiveness of the Mississippi Schools for the Deaf and Blind pursuant to the authority granted by MISS. CODE ANN. Section 5-3-57 et seq. (1972).

Scope and Purpose

The purpose of this review is to compare the cost and effectiveness of Mississippi's residential schools for hearing- and visually-impaired children with the education of the hearing- and visually-impaired within the state's local school districts.

Method

PEER reviewed relevant sections of federal laws and regulations governing the education of the disabled, as

well as state laws, rules, regulations, policies, plans, and procedures.

PEER also interviewed staff and conducted classroom and residential observations at the Schools for the Deaf and Blind. This review includes analysis of documents from the State Department of Education, associations, and information from residential schools of other states.

Background

Mission and Purpose of Mississippi's Schools for the Deaf and Blind

Mississippi has provided residential schools for the deaf and blind since the mid-1800s.

The Mississippi Legislature has provided for the education of deaf and blind children since the early nineteenth century. In 1829, the Mississippi Legislature passed an act to provide for the education of deaf children in out-of-state residential schools. In 1848, the Legislature established an institution in Jackson for the instruction of the blind and followed with an institution for the education of the deaf in 1854. The schools moved to their present locations in 1951. In 1989, the Legislature moved the schools under the control of the State Board of Education.

The Mississippi Schools for the Deaf and Blind provide day and residential services to hearing and/or visually impaired children between the ages of three and twenty-one and early intervention services to hearing and/or visually impaired children from birth to age five. Federal regulations define visual impairment, hearing impairment, and deafness as follows:

> *Visual impairment including blindness means an impairment in vision that, even with correction, adversely affects a child's educational performance. . . .Hearing impairment means an impairment in hearing, whether permanent or fluctuating, that adversely affects a child's educational performance but that is not included under the definition of deafness. . . .Deafness means a hearing impairment that is so severe that the child is impaired in processing linguistic information through hearing, with or without amplification, that adversely affects a child's educational performance.* (34 CFR 300.7)

During FY 2000, the Schools for the Deaf and Blind operated on a budget of $11,145,000. The schools receive one annual appropriation from the Legislature.

Exhibit 1 on page 4 outlines the major programs offered by each of the schools.

Exhibit 1: Major Academic Offerings by the School for the Blind

1999-2000

Program	Description	Served
Regular Academic Curriculum	Consists of standard courses set by the State Board of Education that may lead to attainment of a high school diploma. Serves kindergarten through 12th grades.	59
Life Skills Curriculum	Provides a modified curriculum to students unable to meet objectives of the regular academic curriculum.	10
Mainstreaming Program	Allows high school students who are successfully participating in the academic curriculum to take selected courses in a local high school.	4*
Pre-vocational Program	Provides a modified curriculum for multiple disabled students. Courses are offered in functional math, functional science, functional social studies, and language/communication. Offerings also include leisure skills, orientation and mobility, low vision, independent living, assistive technology, and Braille.	21
Vocational Training	Provides work experiences, job training, and courses for students. Available offerings include: Family/ Consumer Sciences, Career Discovery, Work Experience, and Work Study.	48*
Kindergarten Class	Provides an academic curriculum to five-year old children.	7*
Instructional Resource Center	The School for the Blind serves as a repository for large print and Braille textbooks for school districts that serve visually impaired students.	297
Early Childhood Intervention Services	Provides services to visually impaired infants and toddlers in their homes or through their pre-school programs. This program is called the Comprehensive Home-Based Intervention Program (CHIP), and serves children from birth to age five.	25
Outreach	The School for the Blind houses a low-vision clinic where students in school districts throughout the state receive low-vision screenings.	110
	Lends low-vision aids to visually impaired students in districts throughout the state.	22 aids
	Serves as an assessment and training center for children who are visually impaired. Also serves as a training center for parents as well as district personnel who work with visually impaired children.	14 districts

* These students are included in the regular academic count.

SOURCE: Mississippi School for the Blind

Exhibit 1: Major Academic Offerings by the School for the Deaf

1999-2000

Program	Description	Served
Regular Academic Curriculum	Consists of standard course offerings approved by the State Board of Education that may lead to the attainment of a high school diploma. Serves students from pre-kindergarten through 12th grades.	149
Mainstreaming Program	Allows high school students who are successfully participating in the academic curriculum to take selected courses in a local high school.	0
Vocational Training	Provides a full array of courses that prepare high school students for employment opportunities or further vocational training upon graduation. Available classes include: Buildings and Grounds, Business Technology, Food Service, and Graphic Arts.	25*
Pre-school/ Kindergarten	Provides an academic curriculum for four- and five-year-olds.	3*
Early Childhood Intervention Services	Provides services to hearing impaired infants and toddlers in their homes or through their pre-school programs. (Referred to as Ski*Hi.)	41
Outreach	Loans tapes to parents and the community for deaf awareness, and provides workshops to district staff on request.	300

* These students are included in the regular academic count.

SOURCE: Mississippi School for the Deaf

A Changed Environment: Current Federal Laws and Regulations Governing the Education of the Disabled

Since 1975, federal law has required local school districts to provide a free and appropriate public education to disabled children, including the hearing- and visually-impaired.

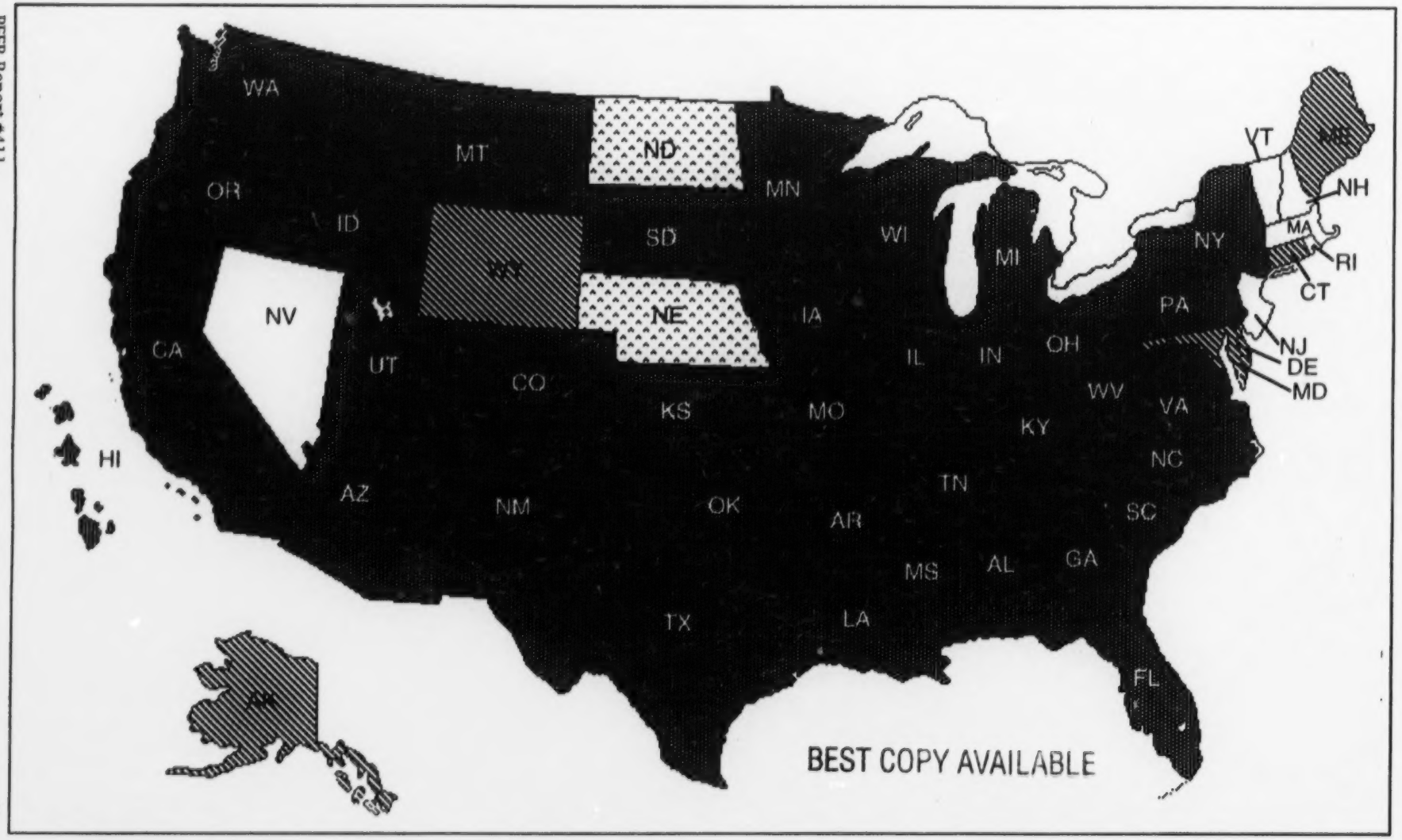
Passage of amendments to the federal Education of the Handicapped Act in 1975 (popularly called the Individuals with Disabilities Education Act, or IDEA) had a major impact on education of the state's hearing and visually impaired children. Basically, these laws and regulations require all local public school districts to provide disabled children, including those who are visually- and/or hearing-impaired or multi-handicapped, a free and appropriate public education in the least restrictive environment.

Although federal laws do not require states to include a residential program in their continuum of services to children who are hearing- and/or visually-impaired, forty-four states have a publicly financed residential school for the deaf and/or blind (see Exhibit 2, page 7).

In Mississippi, 78% of hearing-impaired and 64% of visually-impaired students are being educated in the local school districts.

Currently, the majority of hearing-impaired (78%) and visually-impaired children (64%) receiving a public school education are being educated in their local school districts rather than in one of the state's two residential schools. (See Appendix A, page 19, for data on hearing- and visually-impaired students by county.)

Exhibit 2
States with Publicly Financed Residential Schools for the Deaf and Blind



Have Public Residential Schools for the Blind and Deaf

Have Only a Public Residential School for the Blind

Have No Public Residential Schools for the Blind or the Deaf

Have Only a Public Residential School for the Deaf

Sources: *Directory of Services for Blind and Visually Impaired Persons in the United States* (1998); *American Annals of the Deaf* (1999)

Comparison of Costs and Effectiveness

Because federal law now requires all school districts to provide a free and appropriate public education to hearing- and visually-impaired students which may, but is not required to, take place in a residential setting, and because the Schools for the Deaf and Blind have continued to educate students with these disabilities, the state now faces a scenario of funding and operating dual service providers for hearing- and visually-impaired students. To compare the service providers, PEER first calculated annual costs per student at the Schools for the Deaf and Blind and for hearing- and visually-impaired students in the local school districts statewide. PEER then sought to identify benefits provided by a residential education and compare them to those provided by the districts.

At a FY 1999 cost of $42,500 per student, it cost $34,700 per year more to educate a hearing- or visually-impaired student at the state's residential schools than in the local public school districts, with no conclusive evidence of greater benefits from a residential education.

High Costs of a Residential Education

Local school districts' FY 1999 average cost per student for visually- or hearing-impaired students was $7,800. The FY 1999 average cost per student at the Schools for the Blind and Deaf was $42,500.

Based on the most recent data available from the State Department of Education, the FY 1999 average cost of educating a child with special educational needs (which includes children who are hearing and/or visually impaired) in the local public school districts was $7,800. This cost includes administrative costs and other non-instructional costs such as plant operation and maintenance, food services, and transportation, but does not include amortized capital facility costs. The FY 1999 cost of educating a child at the state's residential schools for the hearing- and visually-impaired, excluding capital facility costs, was $42,500. (The FY 2000 cost per student was $44,623, and $47,683 when amortized capital facility costs were included.)

Exhibit 3 on page 9 contains the results of PEER's survey of the per student costs of residential schools in selected states. As shown on the exhibit, wide variation exists in the cost per student, ranging from $32,061 in Tennessee to $96,734 in North Carolina. Factors affecting this variation include the percentage of multi-handicapped students (which results in higher education costs) and the number of students enrolled (smaller schools generally have a higher cost per student).

Exhibit 3

1998-1999 Average Cost Per Student in Selected Public Residential Schools for the Deaf and Blind^

State	Expenditures	Cost per Student	On-Campus Enrollment	% Multihandicapped	% Residential
Mississippi					
Schools for the Deaf and Blind	$10,231,745	$42,455	241	8%	72%
Texas					
School for the Deaf	$21,836,337	$42,566	513	14%	70%
School for the Blind	$7,252,323*	$47,401	153	67%	92%
North Carolina					
Governor Morehead School for the Blind	$8,706,082	$96,734**	90	18%	83%
NCSD, ENCSD, CNCSD (Schools for the Deaf)	$26,892,789	$40,259	668	5%	39%
Alabama Institute for the Deaf and Blind					
School for the Blind	$4,816,200	$40,135	120	0	66%
School for the Deaf	$8,922,056	$36,868	242	0	83%
Helen Keller School for the Multiple Disabled	$4,759,641	$58,761	81	100%	88%
Tennessee					
School for the Blind	$6,577,819	$39,388	167	75%	72%
W. Tenn. School for the Deaf	$1,474,828	$32,061	46	40%	43%
Tennessee School for the Deaf	$10,029,914	$50,656	198	5%	66%

Arizona					
School for the Deaf and Blind	$13,565,210	$53,406	254	49%	41%
Louisiana					
School for the Visually Impaired	$4,369,503	$87,390	50	82%	68%
School for the Deaf	$12,116,040	$42,364	286	65%	20%
Georgia					
Georgia Academy for the Blind	$5,706,124	$36,814	155	39%	77%
Georgia School for the Deaf	$4,404,336	$44,488	99	20%	81%
Arkansas					
Arkansas School for the Deaf	$7,505,681	$39,297	191	14%	58%
Arkansas School for the Blind	$5,116,287	$48,727	105	20%	43%

^These figures represent a best estimate of the average cost per student. This is due to the fact that the types of programs included in the total expenditure column (and therefore distributed among the on-campus students to arrive at the cost per student) vary from state to state. For example, some states included expenses for pre-school and outreach services (in general, a relatively small portion of a school's total expenditures), while others did not.

*Texas School for the Blind expenditures include instructional and residential expenses only and omit expenses for both related and support services and short-term summer programs.

**Superintendent of Governor Morehead School for the Blind cites declining enrollment and low student to teacher ratios as contributing to the high cost per student.

SOURCE: Business offices of the respective schools.

Factors Driving High Relative Costs of a Residential Education

Factors contributing to the high relative costs of operating the state's residential schools for the hearing- and visually-impaired include unique cost components not present in local school districts (e.g., operating and staffing dormitories); allocation of other costs among fewer students; and, expansion of a pre-vocational program with costly capital facility and specialized staffing needs.

Certain Costs are Unique to a Residential School

Costs unique to a residential school include additional transportation and meal costs; providing after-hours leisure activities; and operating and staffing dormitories, an infirmary, and a security station.

A residential facility has certain cost components that are not components of local public school district costs. Unique costs include transporting residential students to and from their homes every week; providing leisure activities and meals after school hours; and, operating and staffing dormitories, a twenty-four-hour infirmary, and a security station. When dormitories are not at full capacity, such as is presently the case at the School for the Blind (sixty-five percent of capacity in FY 2000), per-student costs are even higher.

Also, the Mississippi Schools for the Deaf and Blind have assumed the role and associated costs of functioning as a statewide resource center (e.g., operation of the low-vision clinic, providing a central repository for large print books, provision of training to teachers of hearing and visually impaired students).

Other Costs Must Be Allocated among Fewer Students

Non-instructional Operating Costs

At the state's residential schools, administrative overhead and maintenance costs must be distributed among a small number of students, currently fewer than in the smallest of the local school districts.

In a local public school district, non-instructional costs such as administrative overhead and facilities maintenance are generally distributed on a per-student basis among a much larger number of students than at the state's two residential schools for the hearing- and visually-impaired. The average enrollment of a public school district in Mississippi is 3,305 students (ranging from 248 students in the Clay County School District to 31,936 in the Jackson Municipal Separate School District), versus the combined enrollment of 241 students at the Schools for the Deaf and Blind.

Capital Facility Costs

Costs of the residential schools' multi-year capital improvement plan add $3,060 to the annual average cost per student.

Since 1994, the Schools for the Deaf and Blind have been undergoing major capital facility improvements, including the construction and renovation of new dormitories and academic buildings. Through the 2000 Session, the Legislature had appropriated $25 million to the school's capital improvement program. As of September 2000, the schools had expended $18.5 million of the appropriated funds and plan to request an additional $30 million from the Legislature in order to complete their $55 million master capital improvement plan (refer to Appendix B on page 24.) Amortizing these capital facility costs over thirty years adds $3,060 to the cost per student annually.

Instructional Costs

Part of the relatively high cost of the state's residential programs for the hearing- and visually-impaired is the fact that the student-teacher ratios at the residential schools are lower than in the districts. During FY 2000, the average student-teacher ratio at both the School for the Deaf and the School for the Blind was 4:1. A majority (48%) of hearing and visually impaired students educated in the local school districts are mainstreamed in classes with an average student-teacher ratio of 16:1. Twenty-nine percent of hearing- and visually-impaired students spend a portion of the school day mainstreamed, and another portion of the day receiving instruction on a more individual basis. Sixteen percent receive instruction in

self-contained special education classes with student-teacher ratios of 7:1. Another seven percent are in self-contained classes for either the hearing- or visually impaired and students requiring similar services, having an average student-teacher ratio of 8:1. (See related discussion of no conclusive evidence of greater benefits from a residential education on page 15).

Expansion Plans for the School for the Blind's Pre-Vocational Program Include a $2.4 Million Facility

Students Served by the Pre-Vocational Program

Twenty-two percent of the School for the Blind's students participate in the pre-vocational program for multiple disabilities. These students require a wide range of training and special assistance, with accompanying additional costs.

As described in Exhibit 1 on page 4, the School for the Blind has established a pre-vocational program to serve deaf/blind and multiple disabled students. Twenty-two percent of the students enrolled at the School for the Blind (twenty children) receive special education through the pre-vocational program. This includes nine children classified as multiple handicapped according to their Individualized Education Programs, three students who are both hearing- and visually-impaired, and eight students assigned to the program based on decisions made during their Individualized Education Program conferences, based on multiple factors, including their low performance in the regular educational program.

The deaf/blind and multiple disabled students presently served by the pre-vocational program require a wide range of training and special assistance. This leads to additional costs (see page 15) and raises the question of whether many of the students enrolled in the pre-vocational program are capable of fulfilling the statutory objectives of becoming "self-sustaining" following graduation (see following subsection).

Policy Implications of Expanding the Pre-Vocational Program

A significant issue facing residential schools for the hearing- and visually-impaired is to establish the minimum functioning level at which the schools for the deaf and blind can appropriately serve hearing- and visually-impaired children. The enabling statute for the Mississippi Schools for the Deaf and Blind (MISS. CODE ANN. Section 43-5-17) sets the following educational standards for the schools:

> *The State Board of Education shall maintain the two (2) schools at as high a grade of*

> *work and education as may be practicable, and shall endeavor to give the pupils the same extent and scope of education that the pupils would receive if attending the public schools of this state; and shall have diplomas or certificates granted unto those pupils who have successfully finished the prescribed courses taught.*

Further, MISS. CODE ANN. Section 43-5-15 states:

> *Each school shall provide requisite facilities for every pupil therein to acquire as complete a literary and musical education as practicable; and shall provide and maintain an industrial department in which expert instruction shall be given in such trades and crafts as may be suited to render the pupil therein self-sustaining in after life.*

The Mississippi School for the Blind's admissions criteria require that "the student must function at or above the level of a trainable mentally retarded individual" and that the visual disability must be the primary disabling condition. Other states surveyed by PEER had similar minimum requirements. For example, Alabama requires a minimum IQ score of 30 for admission to its Institute for the Deaf and Blind and South Carolina's School for the Multihandicapped does not accept a child below the level of trainable mentally retarded.

Federal statutes allow residential facilities serving individuals with disabilities to establish their own admission standards--i.e., they do not have to serve all visually and hearing impaired children.

The Legislature and the State Department of Education must determine whether expanding the pre-vocational program, which may not fall within the parameters originally established in state law for the Schools for the Deaf and Blind, is the most prudent use of state resources.

A 1993 feasibility study of the sale and relocation of the Schools for the Deaf and Blind noted "a reduction in enrollment [at the schools] . . . partially due to the impact of P.L. 94-142" and recommended that the schools "develop a special/separate program to serve multihandicapped children. . .with opportunities for these children to be 'mainstreamed' in regular MSD/B programs as deemed appropriate." However, the policy implications of expanding the School for the Blind's pre-vocational program (and the resulting commitment to the capital facility and staffing) are that the Legislature and the State Department of Education must determine whether expanding a program which may not fall within the parameters originally established in state law for the Schools for the Deaf and Blind is the most prudent use of state resources.

Costs Related to the Planned Expansion of the Pre-vocational Program for the Multi-handicapped

The pre-vocational program is costly because of the additional therapeutic needs and resources of this sub-population of the hearing- and visually-impaired. A component of the unfunded portion of Mississippi's proposed capital facility improvement plan for the Schools for the Deaf and Blind is a proposed $2.4 million facility for the pre-vocational program. According to the chief administrator of the pre-vocational program, if the facility is constructed, the school would need specialized staff for the facility, including an additional orientation and mobility specialist, occupational and physical therapists, teachers with special education credentials, and other specialists.

No Conclusive Evidence of Greater Benefits from a Residential Education

Given that the residential education provided by the Schools for the Deaf and Blind cost $34,700 more per student in FY 1999 than the education provided by the local districts for hearing- and visually-impaired students, PEER sought to identify the benefits that could be provided by a residential education and compare them to those provided by the districts.

Both Residential Schools and Local School Districts Employ Some Teachers Who are Not Certified in Visual and Hearing Impairment

Because state regulations allow teachers without certification in visual and hearing impairments to work with visually- and hearing-impaired students, both the residential Schools for the Deaf and Blind and the local school districts employ teachers both with and without such special certification.

Neither the residential schools nor the local school districts require teachers to be certified in visual or hearing impairment in order to teach the visually- or hearing-impaired.

State regulations allow teachers not certified in visual or hearing impairments to obtain practical knowledge of how to educate a hearing- or visually-impaired child through training and professional development. The Schools for the Deaf and Blind, as well as local school districts, employ teachers who are certified in visual and hearing impairments. Teachers who are not certified in visual and hearing impairment are also often educators of visual and hearing impaired students in both the residential schools and the local schools.

No Difference in Educational Requirements

Both residential and local district schools must comply with the same federal laws governing education of individuals with disabilities.

Public Law 105-17 (I.D.E.A. amendments of 1997) requires that the special education services provided for a student with a disability are appropriate with specially designed instruction to meet the unique, individual needs of each student. These requirements are implemented through:

- "free and appropriate public education" requirements (services are provided that address all of the student's identified special needs);
- Individualized Education Program requirements (services are based on individualized education and ongoing assessments);
- "least restrictive environment" requirements (services and placements are based on the student's unique needs and not on the student's disability).

Federal law requires both the residential schools and the local school districts to provide visually- and hearing-impaired students with a "free and appropriate public education. . .in the least restrictive environment."

Further, federal regulations recognize the unique communication needs of sensory impaired children, particularly the hearing-impaired population (see 34 CFR 300.346). Individualized Education Programs require that decisions regarding instruction include opportunities for direct communication with peers and professional personnel in the student's language and communication.

The State Department of Education (SDE) attempts to ensure compliance with federal law requiring a free and appropriate public education by evaluating the special education services provided by each school district and the Schools for the Deaf and Blind, according to a detailed, regulation-based audit plan. Evaluators from the department's Office of Special Education conduct an on-site review of each district and the Schools for the Deaf and Blind in a four-year cycle. In the most recent review cycle, evaluators cited deficiencies in both the Schools for the Deaf and Blind and the local school districts. For example, both the residential schools and the local school districts were cited for failure to ensure that hearing aids of hearing impaired students were checked on a regular basis and for ensuring that appropriate supplies were available to implement students' Individualized Education Programs. Although the Schools for the Deaf and Blind had some exceptions from their review, the schools have addressed and cleared all areas of deficiency in the most recent review cycle. Two of the districts cited for deficiencies involving hearing- and visually-impaired

students have been given clearance and the other two districts are in the process of addressing their deficiencies.

No Clear Evidence of Differences in Educational Outcomes

For FY 1996 through FY 2000, the School for the Blind had a higher graduation rate with diplomas than the districts and the School for the Deaf had a slightly lower graduation rate with diplomas than the districts. However, these rates should be considered in light of the small numbers of visually- and hearing-impaired students graduating with diplomas statewide.

Hearing- and visually-impaired students graduating from either the Schools for the Deaf and the Blind or the local school district graduate with either a certificate or a diploma. While the diploma indicates successful completion of standard high school coursework, the certificate indicates successful completion of the student's Individualized Education Program.

Between FY 1996 and FY 2000, the School for the Blind graduated 80% of its students with diplomas, while the districts graduated 31% of their students with diplomas. For the same period, the School for the Deaf graduated 18% of its students with diplomas, while the districts graduated 23% of their students with diplomas. However, these percentages should be considered in light of the small number of visually-impaired students graduating with diplomas statewide (ranging from three in 1996 to thirteen in 2000) or hearing-impaired graduates (ranging from three in 1996 to eleven in 2000) for these years.

No Difference in Extracurricular Activity Requirements

Both residential and local district schools must comply with federal law governing education of individuals with disabilities that sets forth requirements for extracurricular activities.

Laws and regulations pertaining to a free and appropriate education require states to make the necessary adaptations to physical education classes so that children with special needs may participate equally in such classes. Laws and regulations also allow adaptations to team sports when a child with special needs participates.

Recommendation

Due to the relatively high cost of a residential education for hearing- and visually-impaired students, the State Department of Education should further refine cost and effectiveness comparisons to develop policy options addressing the future of the Schools for the Deaf and Blind. This proposal could include policy options such as continuing to fund the schools as presently constituted, or closing the schools and implementing one or some combination of the following:

- offering pro rata grants to districts for the education of hearing- and visually-impaired students;
- developing specialized education centers for visually-impaired and hearing-impaired students in selected school districts;
- executing agreements with residential schools in surrounding states to educate students who cannot be served by the local districts.

As soon as is practicable, but no later than the 2002 legislative session, the department should present this proposal to the House and Senate Education committees and other appropriate legislative committees for their use in budget discussions and policy debate.

Appendix A

Distribution of *Hearing* Impaired Students by Local School District	Distribution of *Visually* Impaired Students by Local School District
Districts with students at MSD only (10 - eight have only one hearing impaired student)	Districts with students at MSB only (15 - twelve have only one visually impaired student)
Districts with students in local schools only (58)	Districts with students in local schools only (51)
Districts with students at both MSD and district schools (62)	Districts with students at both MSB and district schools (35)
Districts with no identified HI students-22	Districts with no identified VI students-51

This table shows that 80% of the school districts that exclusively send blind or deaf children to the Schools for the Deaf and Blind have only one hearing or visually impaired child.

Appendix A: FY2000 Distribution of Students Educated at the School for the Deaf by County of Legal Residence

District	Number of Students
NATCHEZ-ADAMS	5
ALCORN	2
AMITE	1
ATTALA	0
BENTON	0
BOLIVAR	4
CALHOUN	0
CARROLL	0
CHICKASAW	0
CHOCTAW	0
CLAIBORNE	0
CLARKE	0
CLAY	1
COAHOMA	3
COPIAH	4
COVINGTON	1
DESOTO	2
FORREST	8
FRANKLIN	0
GEORGE	1
GREENE	0
GRENADA	2
HANCOCK	1
HARRISON	2
HINDS	23
HOLMES	2
HUMPHREYS	1
ITAWAMBA	0
JACKSON	1
JASPER	0
JEFFERSON	4
JEFFERSON DAVIS	0
JONES	2
KEMPER	1
LAFAYETTE	2
LAMAR	0
LAUDERDALE	6
LAWRENCE	1
LEAKE	1
LEE	3
LEFLORE	5
LINCOLN	5
LOWNDES	0
MADISON	4
MARION	1
MARSHALL	0
MONROE	2
MONTGOMERY	0
NESHOBA	3
NEWTON	0
NOXUBEE	1
OKTIBBEHA	2
PANOLA	2
PEARL RIVER	2
PERRY	0
PIKE	5
PONTOTOC	0
PRENTISS	0
QUITMAN	1
RANKIN	8
SCOTT	2
SHARKEY/ISSAQUENA	4
SIMPSON	1
SMITH	2
STONE	0
SUNFLOWER	1
TALLAHATCHIE	0
TATE	1
TIPPAH	0
TISHOMINGO	0
TUNICA	1
UNION	1
WALTHALL	1
WARREN	3
WASHINGTON	1
WAYNE	0
WEBSTER	0
WILKINSON	1
WINSTON	3
YALOBUSHA	1
YAZOO	1
TOTALS	149

SOURCE: Mississippi School for the Deaf

Appendix A: FY2000 Distribution of Hearing Impaired Students Educated in Local School Districts by County

District	Number of Students
NATCHEZ-ADAMS	8
ALCORN	7
AMITE	1
ATTALA	3
BENTON	3
BOLIVAR	2
CALHOUN	9
CARROLL	0
CHICKASAW	1
CHOCTAW	1
CLAIBORNE	2
CLARKE	2
CLAY	4
COAHOMA	5
COPIAH	2
COVINGTON	0
DESOTO	35
FORREST	15
FRANKLIN	0
GEORGE	6
GREENE	2
GRENADA	4
HANCOCK	3
HARRISON	46
HINDS	39
HOLMES	4
HUMPHREYS	2
ITAWAMBA	1
JACKSON	23
JASPER	2
JEFFERSON	0
JEFFERSON DAVIS	3
JONES	11
KEMPER	1
LAFAYETTE	5
LAMAR	11
LAUDERDALE	18
LAWRENCE	1
LEAKE	6
LEE	30

District	Number of Students
LEFLORE	8
LINCOLN	7
LOWNDES	8
MADISON	12
MARION	2
MARSHALL	2
MONROE	5
MONTGOMERY	2
NESHOBA	5
NEWTON	2
NOXUBEE	0
OKTIBBEHA	6
PANOLA	10
PEARL RIVER	5
PERRY	2
PIKE	6
PONTOTOC	4
PRENTISS	10
QUITMAN	1
RANKIN	24
SCOTT	3
SHARKEY/ISSAQUENA	0
SIMPSON	6
SMITH	1
STONE	2
SUNFLOWER	1
TALLAHATCHIE	3
TATE	3
TIPPAH	4
TISHOMINGO	1
TUNICA	1
UNION	2
WALTHALL	1
WARREN	6
WASHINGTON	7
WAYNE	8
WEBSTER	2
WILKINSON	0
WINSTON	1
YALOBUSHA	2
YAZOO	8
TOTAL	501

SOURCE: Mississippi Department of Education.

Appendix A: FY2000 Distribution of Students Educated at the School for the Blind by County of Legal Residence

District	Number of Students
NATCHEZ-ADAMS	1
ALCORN	1
AMITE	1
ATTALA	1
BENTON	0
BOLIVAR	1
CALHOUN	0
CARROLL	0
CHICKASAW	0
CHOCTAW	1
CLAIBORNE	0
CLARKE	3
CLAY	0
COAHOMA	2
COPIAH	4
COVINGTON	1
DESOTO	1
FORREST	1
FRANKLIN	0
GEORGE	0
GREENE	1
GRENADA	1
HANCOCK	0
HARRISON	3
HINDS	13
HOLMES	2
HUMPHREYS	0
ITAWAMBA	1
JACKSON	2
JASPER	0
JEFFERSON	1
JEFFERSON DAVIS	0
JONES	2
KEMPER	0
LAFAYETTE	0
LAMAR	0
LAUDERDALE	6
LAWRENCE	0
LEAKE	0
LEE	1
LEFLORE	0
LINCOLN	1
LOWNDES	1
MADISON	2
MARION	2
MARSHALL	0
MONROE	3
MONTGOMERY	1
NESHOBA	0
NEWTON	1
NOXUBEE	0
OKTIBBEHA	0
PANOLA	0
PEARL RIVER	1
PERRY	0
PIKE	2
PONTOTOC	0
PRENTISS	0
QUITMAN	0
RANKIN	12
SCOTT	0
SHARKEY/ISSAQUENA	0
SIMPSON	1
SMITH	0
STONE	0
SUNFLOWER	1
TALLAHATCHIE	0
TATE	0
TIPPAH	0
TISHOMINGO	0
TUNICA	0
UNION	0
WALTHALL	0
WARREN	2
WASHINGTON	7
WAYNE	0
WEBSTER	0
WILKINSON	1
WINSTON	2
YALOBUSHA	0
YAZOO	2
TOTALS	93

SOURCE: Mississippi School for the Blind

Appendix A: FY2000 Distribution of Visually Impaired Students Educated in Local School Districts by County

District	Number of Students	District	Number of Students
NATCHEZ-ADAMS	2	LEFLORE	0
ALCORN	4	LINCOLN	3
AMITE	0	LOWNDES	4
ATTALA	4	MADISON	4
BENTON	0	MARION	1
BOLIVAR	5	MARSHALL	1
CALHOUN	0	MONROE	4
CARROLL	1	MONTGOMER	2
CHICKASAW	1	NESHOBA	1
CHOCTAW	0	NEWTON	3
CLAIBORNE	0	NOXUBEE	1
CLARKE	1	OKTIBBEHA	1
CLAY	0	PANOLA	3
COAHOMA	3	PEARL RIVER	2
COPIAH	1	PERRY	0
COVINGTON	0	PIKE	2
DESOTO	11	PONTOTOC	4
FORREST	6	PRENTISS	2
FRANKLIN	2	QUITMAN	1
GEORGE	1	RANKIN	4
GREENE	0	SCOTT	0
GRENADA	0	SHARKEY/ISS	0
HANCOCK	2	SIMPSON	1
HARRISON	16	SMITH	1
HINDS	9	STONE	0
HOLMES	2	SUNFLOWER	7
HUMPHREYS	1	TALLAHATCH	1
ITAWAMBA	2	TATE	2
JACKSON	14	TIPPAH	3
JASPER	0	TISHOMINGO	0
JEFFERSON	0	TUNICA	0
JEFFERSON DAVIS	3	UNION	0
JONES	4	WALTHALL	1
KEMPER	0	WARREN	2
LAFAYETTE	0	WASHINGTOI	3
LAMAR	0	WAYNE	0
LAUDERDALE	4	WEBSTER	0
LAWRENCE	0	WILKINSON	0
LEAKE	1	WINSTON	4
LEE	9	YALOBUSHA	0
		YAZOO	2
		TOTALS	179

SOURCE: Mississippi Department of Education.

Appendix B

Capital Construction Costs: Schools for the Deaf and Blind

	Funding Source	Authorized	Expended	Balance
Phases 1 and 2: 1995 Capital Improvements	$9,911,934.55 [Education Enhancement Fund] $654,227.36 [Bond from SB3304] $236,970.59 [Right-of-Way Easement Reimbursement] $100,000.00 [Dept. of Ed. General Renovation Fund]	$10,903,132.50	$10,896,353.43 Engineer's fees ($930,759.34); RFP ($360.89); Central air systems for MSD campus buildings ($564,765); Loop road around campus ($839,166.53); Electrical and cable work ($226,197.27)	$6,779.07
[redacted]			**School for the Blind New Construction:** Five (5) dormitories, one independent living center, and one student center; **School for the Deaf New Construction:** One (1) high school girls' dorm; **New construction for combined use:** cafeteria and dining facility, vocational building, central administration building ($8,335,104.40)	[redacted]
Phase 3: Renovations and Additions	$8,499,424.92 [3rd sale on SB3304] $898,425.71 [Dept. of Ed. General Renovations] $193,065.45 [Education Enhancement Fund]	$9,590,916.08	$7,254,609.05 Engineer's fee ($568,584.11); RFP ($43.32); Handicapped accessibility report ($100); electrical work ($92,813.99); phone services ($4,941.63); construction of academic complexes (6,588,126)	$2,336,307.03
Furniture and Equipment	$828,241.29 [Dept. of Education] $216,987.19 [3rd sale on SB3304]	$1,045,228.48	$326,067.39 Engineer's fee (9,260.34); RFP ($92.95); Dormitory and Office Furniture ($266,965.10);	$719,161.09
[redacted]			Kitchen Equipment ($9,742); Washers/Dryers ($7 707); Library Shelving ($32,300)	[redacted]
Phase 4:SB3315 (Unsold Bond)		$4,000,000	$0 To be used for converting old high school boys' dormitory into security and nurse's station; perimeter fencing around campuses; completion of lab building	$4,000,000
Sub Total		**$25,539,277.06**	**$18,477,029.87**	**$7,062,247.19**

Unfunded Phase 4 Projects	Funding Source	Estimated	Expended	Balance
School for the Blind	$0	$11,345,571 Mobility and physical development center ($8,906,152); Multi-Handicapped Facility ($2,439,419)	$0	$0
School for the Deaf	$0	$11,695,476 Renovation of four dorms and student center ($6,510,495) Addition to Elem. School and Media Center ($5,184,981)	$0	$0
Joint School Project	$0	$6,889,787 Parking and Site Development, Vehicle Shed	$0	$0
Sub Total	**$0**	**$29,930,834.00**	**$0**	**$0**
Overall Total		**$55,470,111.06**		

SOURCES: Architect's February 2000 Report to The Mississippi House Ways and Means Committee; Bureau of Building, Grounds and Real Property Management

Mississippi Department of Education's

Response

to the

PEER Report

on

Mississippi School for the Blind & Mississippi School for the Deaf

FOREWORD

The Department of Education wishes to thank the PEER staff for the professional way in which it carried out its assignment. Also, in joint meetings with staff as we perused the draft copy, we were pleased with the PEER staff's attitude in accepting our comments. Moreover, they inculcated our comments as a part of the final report.

Mississippi Department of Education's Response to the PEER Report on Mississippi School for the Blind & Mississippi School for the Deaf

I. Teacher Qualifications

Mississippi School for the Blind

According to PEER, there was "no appreciable difference in teacher qualifications." The word "qualification" should possibly be changed to "certification." The Mississippi School for the Blind does follow mandates, as do other schools, to hire teachers certified by state standards. The Mississippi School for the Blind (MSB) and local school districts have had to hire teachers who are not certified in vision because there are no teacher training programs in Mississippi that afford teachers the opportunity to obtain vision certification.

However, there are other major differences in the composition of MSB's staff versus those of local school districts. Presently, there are 30 certified teachers and counselors employed at MSB, 19 are dually endorsed (certified in their subject area and in vision). One staff member, (Orientation and Mobility Specialist Senior) is certified by an international certifying body. Of those not certified, five have received some course work toward certification; and five (most recently hired) have received structured professional development. All staff members will continue to receive on-going professional development.

Additionally, some members of the administrative team are also certified in vision. These staff members include the superintendent, curriculum coordinator, admissions coordinator, pre-vocational/deaf-blind coordinator, and director of residence education. These persons are extensively involved in providing new-staff orientation and professional development training. The differences in the number and percentage of dually certified staff, on-going professional development, and the ability of vision certified administrators to supervise provide appreciable differences between MSB's teachers and those of local school districts.

Mississippi School for the Deaf

When looking at teacher qualifications, the PEER committee looked at entry-level qualifications. Mississippi School for the Deaf (MSD) maximizes teacher certification and teacher qualifications through dual certification (sixteen (16) of twenty-seven (27) classroom teachers hold dual certification); Council on Education of the Deaf Certification (Eleven (11) of twenty-seven (27) classroom teachers hold CED Certification); twenty (20) of twenty-seven (27) classroom teachers are certified in Hearing Disabilities (Area 208) and seven (7) of twenty-seven (27) classroom teachers hold AA certification. Professional Development is planned and implemented to address the needs of professionals in the area of deaf education. On-site inservice is provided to special education staff of LEAs as requested by the LEA.

I. Teacher Qualifications (Continued)

At MSD the teachers' ability to communicate directly with students in the students' preferred mode of communication supports the federal mandate of Least Restrictive Environment (LRE).

The PEER Committee's average ratio is correct, based on the total number of students and teachers, excluding the vacant PIN numbers. The actual student-teacher ratio of academic teachers in the classroom during this reporting period was:

Elementary Department	5.6:1
Secondary Department	4.9:1

II. Educational Requirements

Mississippi School for the Blind

MSB does follow the same mandates as other schools regarding requirements for students to graduate. However, in most cases students require additional support in order to successfully complete their requirements. Therefore, MSB offers the basic curriculum and specialized subjects that are often referred to as the "core curriculum for blind and visually impaired students." Depending on the students' needs, their program of study may include orientation and mobility, low vision training, Braille, assistive technology, skills of daily living, and leisure skills. Decisions to incorporate these courses into student's curriculum are individual decisions that are made during IEP meetings. These courses are offered, strongly encouraged, and most students take the courses that are recommended to help enhance their independence.

Mississippi School for the Deaf

The educational requirements for exiting school are the same for both LEA students and MSD students. However, at MSD, students have the opportunity to obtain concurrently, both an academic education resulting in a high school diploma and vocational training.

III. Educational Outcomes

Mississippi School for the Blind

Unless there were identified variables examined to compare educational outcomes, the PEER conclusion cannot be supported by documentation. In order to compare MSB's students' outcome with those of the local school district, specifically identified variables would need

III. Educational Outcomes (Continued)

to be compared. However, just to mention one variable from some of the data that were collected by PEER, MSB posted a graduation rate of 80% during the 1998-99 year compared to 31% percentage recorded by the public school districts.

Mississippi School for the Deaf

What factors affect the outcome of the education for deaf students? The exit exam required for a high school diploma has not been accessible to deaf students until the past three years. The adapted statewide curriculum permits MSD students to master the state-mandated competencies presented in a language mode that facilitates comprehension. The assistance of a communication specialist allows acquisition of language prior to exposure to subject matter.

Reading is the most critical component of education for deaf students. By utilizing the Fairview Reading Program, MSD provides students K-12 a bicultural approach to reading which, in addition to teaching reading with comprehension, raises the proficiency level in English, as well as building proficiency in the manual component (ASL).

Computer technology utilizing Burton Vision, a unique sign language interactive computer program, permits even a three-year-old student to commence language acquisition. For the older student, the same program builds vocabulary through signing, reading and writing.

Supplemental methodology employed by MSD teachers when needed includes the McInnis Association Method for teaching language-deficient children and the daily use of the Fitzgerald Key to teach and promote English grammar.

The climate of the residential school facilitates the development of the whole child. The educational outcome of the deaf student is also influenced by exposure to deaf culture and to deaf role models. Not only does MSD offer Deaf Studies classes which teach the student deaf heritage and pride (acceptance), but provides multiple deaf role models who interact daily with the students. Deaf teachers, counselors and support personnel (twelve (12) in the elementary department and eleven (ll) in the secondary department) provide a living example of what a deaf individual can achieve.

MSD uses an Alternative Learning Center (ALC) in lieu of suspension. When a student is sent to ALC for a rule infraction, the student's Individualized Education Program (IEP) continues to be implemented.

Students' language is further developed through the optional summer enrichment program which concentrates on building and honing language skills.

III. Educational Outcomes (Continued)

Technology is further maximized by students' access to the MSD media center which provides closed captioned films and videos. Students wait in line during the after school program for a turn to communicate with extended family and deaf pen pals, both in and out of state, via e-mail. In the residential program students have access to TDDs (Telecommunication Devices for the Deaf), which allow them to communicate with family, employers or friends, either directly through TDD or through the TDD and Deaf Relay Service.

IV. Extracurricular Activity Requirements

Mississippi School for the Blind

Although MSB does not have extracurricular activity "requirements," students are provided greater opportunities to participate and to be successful. As a school, we cannot impose extracurricular activities requirements. Our tasks are to make available those activities that students may find of interest, provide the necessary adaptations and instruction, and provide opportunities for participation. In the extracurricular activities here at MSB, blind and visually impaired students are competing with other students with similar challenges and they are just as likely to succeed as their peers.

Generally, we receive most of our information visually. If students are unable to see activities because of a visual impairment, they will probably not be able to compete in most activities at the same level as their peers who do not have these challenges. Therefore, the likelihood of students successfully being a part of competitive varsity sports in their local school districts is not as great as in a setting such as MSB. Students at MSB may choose to participate in wrestling, cheerleading, track and field, and swimming. During the 1999-2000 school year, about 50 percent of all students enrolled in grades 7-12 participated in one or more of these activities. Additionally, where feasible and appropriate, MSB's students are provided opportunities to compete against their sighted peers.

Mississippi School for the Deaf

Spiritual and moral development is fostered through the residential program which offers opportunity for participation in the Fellowship of Christian Athletes, the Value of Life program and, with parental permission, Wednesday evening church activities in local churches which promote a deaf ministry. The residential program, where seventeen (17) deaf staff are role models in life choices other than teaching careers, is strictly a deaf-focused environment where students learn colloquial sign language, Deaf customs and culture, e.g., how does one flip a light switch to gain a deaf person's attention without inadvertently signaling an emergency? In the deaf-focused environment students are exposed to social skills, independent living skills (student have designated chores in the residential program)

IV. Extracurricular Activity Requirements (Continued)

and problem-solving techniques. Students who so desire can participate in the Work Experience Program.

Students at MSD have not just the "right" to participate in extracurricular activities, they have an opportunity to participate, not only in athletics, but also in the Academic Bowl, out-of-state Space Camp, national science projects and regional art contests. They participate with team members, opponents and sponsors with whom they can communicate directly.

V. Multi-handicapped

Mississippi School for the Blind

MSB has seen a gradual, steady increase in the number of students served in this department over the past five years. National research appears to support the concept that this population will continue to increase. MSB continues to serve students whose primary handicapping condition is vision, including those with other handicapping conditions, too.

VI. Recommendations

Mississippi School for the Blind

Many local school districts in Mississippi have turned increasingly to MSB as a viable resource. MSB has been assisting these school districts by providing training where feasible and possible. Some of the policy options that may be considered as we look at MSB's future may include:

- continue to fund as presently constituted and design ways to increase its outreach capabilities
- increase its ability to serve as a model and work in conjunction with local colleges and universities to provide teacher training in the area of vision for the state and possibly other states;
- examine the possibility of more short term student placement as more local school districts acquire the training necessary to meet students needs;
- identify variables for local school districts and MSB to collect data for the next three years and then have these variables studied in order to have a more comprehensive comparison of student outcome; and
- continue to design an effective comparison with part of it to include attention to the multi-handicapped population.

Mississippi School for the Deaf

MSD feels that there will always be a need for a residential program for deaf students who cannot be served in the Local Educational Agency.

VII. Summary

In summary, the Department of Education concurs with PEER's recommendation for further study and welcomes the opportunity to research and provide substantiated documentation of the benefits provided to students through the Blind and Deaf schools. We believe that this study will overwhelmingly show that the enhanced services provided to our students at the state level to assist them in becoming productive citizens are greatly needed, are cost-effective, and provide services that would not otherwise be available. In fact, it is most probable that needed services would be cost prohibitive to insure these services are available in every affected school district in the state.

Obviously, when comparing the cost of 24-hour care and education to the cost of more limited day services afforded by local school districts, a significant cost differential exists. However, it is important to note that when comparing Mississippi's cost of residential education to other states, PEER's report shows Mississippi's cost to be very reasonable.

Upon receipt of PEER's final report, we will ask our Office of Accountability to proceed in conducting a thorough study as recommended in your report.

Richard L. Thompson, Ed.D.
State Superintendent of Education

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